

those countries where the above-referenced insurance companies are based and other experts as needed.

- a. The IC shall promulgate an audit mandate implementing the goal of this MOU. This mandate shall outline a work program for the audit firm(s). In addition to establishing a framework for an overall work plan, the mandate shall also establish a mechanism whereby any investigatory or audit work already performed by the various insurance companies in this area is reviewed to determine whether it is consistent with the standards and goals of the mandate and if so, shall be incorporated into the work plan of the IC auditors. The insurance companies and insurance regulators that are parties to this MOU shall ensure that the respective auditing firm(s) and other experts have complete and unfettered access to any and all of their relevant books, records and file archives as is necessary to their audit activities. Such access shall be in cooperation with and in accordance with local insurance authorities and laws. Any documents reviewed or received by the IC will be maintained as strictly confidential.
 - b. As part of the audit mandate, the IC will address the issue of a full accounting by the insurance companies and publication of the names of Holocaust victims who held unpaid insurance policies. In addition, the IC shall establish a toll free mechanism to aid survivors, beneficiaries and heirs of Holocaust victims in the submission of claims and inquiries.
5. The IC shall establish a claims and valuation process to settle and pay individual claims that will be of no cost to claimants. The initial responsibility for resolving claims rests with the individual insurance companies, in accordance with guidelines to be promulgated by the IC. The signatory companies shall submit to the IC all claims received directly by the company within 30 days of receipt. The IC shall endeavor to integrate data already collected by the various U.S. states into the overall process. Such process shall include the establishment of relaxed standards of proof that acknowledge the passage of time and the practical difficulties of the survivors, their beneficiaries and heirs in locating relevant documents, while providing protection to the insurance companies against unfounded claims.
6. Such claims process shall also include the valuation of policies, including, but not limited to, the establishment of standards and formulae to account for currency reforms, currency conversions and interest. In the case of insurance claims that were previously submitted for resolution through a post-war governmental restitution program, the IC shall examine the program, payments and payment calculations to determine if they were equitable and adequate. To the extent an